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District of Nevada  
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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LISA KEITH,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-01110-JAD-VCF

**JOINT STIPULATION FOR EXTENSION OF  
TIME AND ORDER**

**(Third Request)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from January 16, 2019 to **January 17, 2019**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel has chronic migraines, which impair her vision and had a migraine on the date of the current filing deadline. While Counsel for Defendant diligently attempted to finish her response, Counsel could not complete it due to her migraine and impaired vision. Due to Counsel's unexpected health issue, Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in

1 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the  
2 Court's Scheduling Order shall be modified accordingly.

3  
4 Respectfully submitted,

5 Dated: January 16, 2019

/s/ Cyrus Safa

(\*as authorized by email on January 16, 2019)

CYRUS SAFA

Attorney for Plaintiff

8 Dated: January 16, 2019

DAYLE ELIESON

United States Attorney

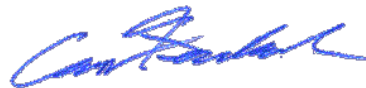
/s/ Tina L. Naicker

TINA L. NAICKER

Special Assistant United States Attorney

12 **APPROVED AND SO ORDERED:**

14  
15 DATED: 1-17-2019



16 THE HONORABLE CAM FERENBACH  
17 UNITED STATES MAGISTRATE JUDGE  
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1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the  
3 **JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED] ORDER**  
4 on the date and via the method of service identified below:

5 **CM/ECF:**

6  
7 Cyrus Safa  
8 Law Offices of Lawrence D. Rohlfing  
9 12631 E. Imperial Highway, Suite C-115  
10 Santa Fe Springs, CA 90670  
11 562-868-5886  
12 Fax: 562-868-5491  
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14 Gerald Welt  
15 Gerald M. Welt, Chtd.  
16 703 S. 8th St.  
17 Las Vegas, NV 89101  
18 702-382-2030  
19 Fax: 702-684-5157  
20 Email: gmwesq@weltlaw.com

21 Attorneys for Plaintiff

22 Respectfully submitted this 16th day of January 2019,

23 /s/ Tina L. Naicker  
24 TINA L. NAICKER  
25 Special Assistant United States Attorney  
26